

CONTOS & BUNCH
LAWYERS

5855 TOPANGA CANYON BOULEVARD
SUITE 400
WOODLAND HILLS, CALIFORNIA 91367-4694
(818) 716-9400

MANUFACTURERS BANK BUILDING
1201 DOVE STREET
PENTHOUSE
NEWPORT BEACH, CALIFORNIA 92660-2841
(714) 752-0488

November 17, 1986

REPLY TO: Woodland Hills

John G. Peterson, Esq.
PETERSON & BRYMAN
8530 Wilshire Blvd., Ste. 407
Beverly Hills, CA 90211

Re: Church of Scientology of California v.
Gerald Armstrong

Dear Mr. Peterson:

On November 10, 1986, we conducted a meet and confer in my office regarding your client's most recent request for production, as well as deposition questions Mr. Armstrong refused to answer at the instruction of counsel.

I have considered the specific request for production we discussed in our meet and confer and have consulted with my client regarding the same. Our position is outlined as follows:

Request No. 1: Mr. Armstrong will make a search for the documents outlined in this request as pertaining only to writings regarding Scientology, L. Ron Hubbard, John Peterson, Eugene Ingram and any other Scientology attorneys. We continue to assert our original objection to any other documents encompassed within the request on the grounds originally stated and on the further grounds that some of the writings are protected by the attorney-client privilege. At the time the original response to the request for production was prepared, I did not realize that some of the documents falling within the request were attorney-client privilege documents prepared by Mr. Armstrong for his attorneys.

Request No. 2: Mr. Armstrong has no documents in response to this request.

Request No. 5: We will continue to assert our objection with respect to this request.

John G. Peterson, Esq.
November 17, 1986
Page 2

Request No. 6: We will continue to assert our objection with respect to this request.

Request No. 9: We will continue to assert our objection with respect to this request.

Request No. 10: We will continue to assert our objection with respect to this request.

Request No. 11: Mr. Armstrong is presently making a search to see whether such correspondence exists. If such correspondence exists and it is relevant to the subject matter of the litigation, it will be produced.

Request No. 12: Mr. Armstrong will search for the tape recording of Dan Sherman. If he can locate it, it will be produced. Otherwise, Mr. Armstrong has no other tape recordings.

Request No. 13: It was agreed that with respect to tax returns, those returns that Mr. Armstrong has will be made available provided that a stipulation is entered into limiting use of the returns to the litigation, the attorneys of record and their clients. I will prepare such a stipulation and forward it to you for your signature.

Request No. 15: Mr. Armstrong will search for the insurance claim made regarding his stolen manuscript. Once it is found, it will be produced. Mr. Armstrong has no other insurance claims.

Request No. 16: We will continue to assert our objection with respect to this request.

Request No. 17: Mr. Armstrong has no documents in response to this request.

Request No. 18: It was agreed that you would provide me with the frame number and date of the videotape in which Mr. Armstrong appears with the item requested.

Request No. 19: These documents are in the possession of cross-complainant in that Mr. Armstrong provided them to an agent of cross-complainant named Rena on November 9, 1984.

Request No. 20: We will continue to assert our objection to this request.

John G. Peterson, Esq.
November 17, 1986
Page 3

Request No. 26: Mr. Armstrong has no documents in response to this request.

Request No. 40: Mr. Armstrong has no documents in response to this request.

With respect to the deposition of Mr. Armstrong, the following areas were designated as those in which Mr. Armstrong refused to answer questions:

1. Pre- and post-Scientology drug use;
2. Margaret Singer's transcript;
3. The fathering of an illegitimate child;
4. A homosexual encounter;
5. The Dincalci tape;
6. A story Mr. Armstrong allegedly sold regarding Scientology and L. Ron Hubbard.

I have not completed my consultation regarding the above-referenced matters with Mr. Armstrong and his Boston counsel. Of course, it will be necessary for me to see a transcript of the depositions before my decision is final. As I understand, the transcript of the first session of Mr. Armstrong's deposition has not been completed. I am in the process of obtaining a copy of the transcript of the second day of his deposition.

Your associate, Mr. Blumenson, estimates the completion of the deposition to take another 2-3 days. Be advised that we object to an additional 2-3 days and will take the matter up with the court via a protective order.

Very truly yours,

CONTOS & BUNCH

JULIA DRAGOJEVIC

JD:kk

cc: Gerald Armstrong
John G. Peterson, 1404 N. Catalina,
Los Angeles, California 90027

3:29:6